

ESTTA Tracking number: **ESTTA862091**

Filing date: **12/04/2017**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91233690
Party	Defendant Rusty Ralph Lemorande
Correspondence Address	RUSTY RALPH LEMORANDE 1245 N CRESCENT HTS BLVD #B LOS ANGELES, CA 90046 UNITED STATES Email: lemorande@gmail.com
Submission	Motion to Compel Discovery or Disclosure
Filer's Name	Rusty Ralph Lemorande
Filer's email	lemorande@gmail.com
Signature	/Rusty Ralph Lemorande/
Date	12/04/2017
Attachments	SEND ESTTA.Motion to Compel Production of Docs.pdf(859461 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Serial No: 87090468

Publication date: 11/29/2016

Opposition Number: 91233690

For the Mark: NIGHT OF THE LIVING DEAD:

)	
Rusty Lemorande <i>in pro per</i>)	
)	
Petitioner,)	
)	
v.)	
)	
IMAGE 10, INC.)	
)	
Respondent.)	
)	

PETITIONER’S MOTION TO COMPEL DISCOVERY

Pursuant to Rule 37 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice (37 C.F.R. § 2.120), Petitioner Rusty Lemorande, (“**Lemorande**”), hereby moves the Board for an Order compelling Respondent IMAGE 10, **LLC** (“**Image 10**”), to produce documents in accordance with the Federal Rules of Civil Procedure.

In support of this motion, Lemorande states as follows:

A: GENERAL REVIEW AND FACTUAL BACKGROUND

Based on a bonafide intent to use, Lemorande diligently researched the mark, “Night Of The Living Dead” (the Mark) and found no registration and evidence of continued or common source use.

Therefore, Lemorande filed his mark application for films. The UPSTO examiner, presumably based on his or her own research, found no conflicts and, therefore, that

application was posted for publication by the USPTO which resulted in an Opposition by Image 10.

That Opposition made unsubstantiated claims of **prior use**, **continued use** and **superior common law rights** without stating any geographic limitation.

Lemorande has reached out to Image 10 to find out if any of those rights can be substantiated, but has received no response. Specifically, Lemorande filed discovery requests to see if there is any evidence of:

a. Any prior, mark rights to the film created in 1968 (which, incidentally, showed no clear owner of a mark in 1968),

b. Any continuous use by Image 10 (which, incidentally, was defunct according to Pennsylvania corporate records for almost 45 years before filing the opposition),

c. Any indication that Image 10 has ever licensed the mark to the many films and TV shows using the same title in the 49 year period following the 1968 movie),

All the above would clearly help Image 10 substantiate its claims.

Lemorande's discovery requests were met with boilerplate objections, and no production of documents or responsive answers.

In addition, **three follow-up e-mails** sent by Lemorande were met with silence and no response of any kind. (See Exhibits A, B and C).

For the record, in their initial discovery conference, Lemorande and Image 10 agreed that email correspondence was acceptable to both parties.

Specifically as to the Request for the Production of Documents, Lemorande timely served his request on Image 10.

Image 10 did serve its responses, but not by email, as had been agreed by the parties, or by a DROPBOX set up (its existence timely communicated to Respondent) for

the convenience of the parties, but by a more time-consuming snail-mail process.

A. AS TO IMAGE 10'S 'GENERAL OBJECTIONS'

In its response document (Exhibit D), Image 10 makes contradictory, pattern, general objections that transform its later, actual responses into useless or near useless information.

For example, in **General Objection A**, Opposer opines that the requests are either: *“irrelevant or not reasonably calculated to lead to the discovery of admissible evidence”*. In essence, Image 10 seeks to decide, both for Petitioner and TTAB, that the requests are needless and not likely to lead to necessary facts or facts helpful to adjudication and resolution of the matter before the Board.

In Petitioner's experience, in U.S. law, it is a judge who determines the matter of relevance, not an opposing party (in this case the 'judge' being the Board). In addition, such a general objection, without specification to any actual, offending requests, seems untenable on its face.

As a general rule, a party may take discovery not only as to matters specifically raised in the pleadings, but also as to any matter which might be reasonably calculated to serve as the basis for an additional claim, defense, or counterclaim. *See* TBMP § 402.01 and Note 3 cited therein.

Here, the results to Petitioner's document requests could be used for any number of later claims, including one that the mark has been abandoned if there are no responsive documents, or that Image 10 is not licensing or producing films bearing that mark.

All of the documents requested potentially are highly pertinent and dispositive to

the core, underlying issue in Image 10's opposition which can be stated in three questions: 1) Has Image 10 used the mark-in-question?, 2) Has Image 10 held itself out to the industry and public as the owner of the mark?, and 3) Has Image 10 policed the use of the mark?

In **General Objection B**, Respondent asserts that the totality of the Requests is *"burdensome and, as designed... to harass rather than to serve any legitimate discovery purpose."*

Petitioner believes it is not up to Respondent to determine what is a '*legitimate discovery purpose*' in the absence of Respondent defining what would be legitimate. As to the request being 'burdensome', it would appear to Petitioner that all discovery requests carry some burden. As to 'harassment' in the document requests, being documents pertaining to standard business inquiries relevant to Respondent's assertion of the maintenance of a common law trademark, it is absolutely unreasonable to typify Petitioner's inquiries as 'harassment'. The TTAB will, obviously, be the judge of that categorization.

In **General Objection C**, Opposer objects to '*each and every*' request as being *vague* and *ambiguous*. This assertion of vagueness and ambiguity is something that hopefully the Board will adjudicate in its consideration of this motion. Petitioner believes the Board will see that **plain and simple language** is used throughout the requests. All words are the 'one dollar' type, and dependent clauses are used at a minimum.

Petitioner would ask that the Board consider the plain language and simplicity of each of these requests in determining whether they are 'vague and ambiguous', and if finding they are not, so instruct Opposer to produce such documents.

In addition, it seems facetious to suggest that '*each and every*' request is so

defined unless Respondent has not taken the time to read each request individually.

In **Objection D**, Respondent finds the Interrogatories to be “*overbroad and not limited to a reasonable time period*”.

The only possible time period in this matter is that which has occurred since 1968 when the initial film was created, and during which Image 10, itself, has asserted common law rights. Respondent’s actions or inactions during that period are material and relevant to its proof of maintaining and policing a trademark throughout that time. In addition, Petitioner does, in fact, provide limits, breaking the period into units to assist Respondent in its responses.

General Objection E is even more specious, suggesting that there is ‘*commercial sensitivity*’ to the information Respondent withholds. If such an objection were generally sustainable (as Image 10 attempts), virtually all relevant information in business litigation would be barred from discovery, vitiating any fair and proper legal adjudication.

Respondent also states, in **Objection E**, that discovery might disclose ‘*information which derives independent economic value from not being generally known*’ implying that such discovery should only occur when the information is already generally known [to the public]. This assertion would make, if sustained, discovery near pointless.

Furthermore, Respondent states that it would be damaged by revealing, through discovery, information that was ‘*acquired primarily through confidential research and development efforts by or on behalf of Opposer*’. Petitioner, in its document requests, is not seeking information as to the means and processes by which Respondent created its sole, motion picture. Even if Petitioner were, it would be hard for Respondent to assert that valuable trade secrets were involved in the film’s customary 1968 production. However, Petitioner is not making such a request. In addition, in the case of

Respondent's claims of secret information immune to discovery, Respondent fails to even attempt to state what requested information is not subject to protection under the Board's standing protective order.

C: AS TO CLAIMS OF ATTORNEY-CLIENT PRIVILEGE.

The attorney/client privilege is not a complete protective bar to a business's transactions. If that were the case, almost all discovery of documents would be moot in business litigation, and only attorneys would be hired to perform administrative and management roles within modern businesses. The attorney/client privilege, generally, attaches only when a document is created in anticipation of litigation. Image 10, as its sole argument in its Opposition, claims common law trademark rights based on, presumably, business transactions concerning the Mark over the course of the last, approximately, 50 years. To claim that all records associated with these transactions are shielded by the attorney-client privilege is to disable fair, legal process as it pertains to the normal course of business dealings and transactions.

Even if it were proper to hide the documents requested due to the attorney-client privilege, discovery rules require that, in such instances, a privilege log be provided

No such privilege log has been produced, and it appears, based on Image 10's complete silence, that none is in the works.

D: AS TO CLAIMS OF WORK-PRODUCT PRIVILEGE

Even more than a claim of attorney-client privilege, the work-product doctrine generally requires that the privilege only extend to 1) the personal opinions and strategies of an attorney in 2) anticipation of litigation.

It is entirely possible that, in the course of doing business during its approximately two years of existence, Image 10 was involved in litigation or pre-

litigation matters pertinent to its assertion of a common law mark. However, in order to protect such documents from discovery, Image 10, once again, would need to provide a privilege log, with its attendant detail, in response to his proper and pertinent discovery request.

E: GENERALLY AS TO THE CONTENT OF OPPOSER'S RESPONSES

As the Board will hopefully see in its review of this motion and its exhibits, all inquiries made in Petitioner's document requests pertain to either 1) the issuance (or non-issuance) by Respondent of licenses or assignments to third-parties, 2) copies of any complaints and other documents filed regarding the Mark, 3) financial statements to show the continuing existence of the Opposer over the period it asserts, 4) the possible filing of trademark applications, 5) documents that show actual ownership of the Mark, 6) documents in support of claims made in the Opposition itself, and, 7) in Requests 9 through 75, documents that simply support Opposer's answers to prior interrogatories which solely seek to determine the relationship (if any) between Opposer and those entities which have made over 149 films or television shows using the title (or derivatives of) "Night Of The Living Dead" over the past 50 years.

With a few exceptions, Opposer's responses to all 75 requests is accomplished with a virtual rubber-stamp. It reads as follows:

"Opposer incorporates the Preliminary Statement and General Objection set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding."

In reacting to this pattern objection, Petitioner reasserts its 1) response above to the attorney-client privilege and work product doctrine assertions, 2) response to the issue of ‘confidential and proprietary information’ (especially given the standing protection of the Board’s protective order) and, 3) Image 10’s assertion of dominion over Petitioner and the Board as to ‘relevance’.

F: AS TO IMAGE 10’S “OVER BURDENSOME” CLAIM

It seems difficult to understand how a business entity, in business for only approximately 2 years, would have such a quantity of documents that would require an unfair burden in producing such documents on said company.

Even if Image 10 would be allowed to assert, as evidence in its opposition, documents acquired during the many years it was not in existence, and those documents were considered voluminous, Image 10 would be required to at least submit a summary of such documents, and, additionally, allow Petitioner the right to review.

In **Responses Numbered 3, 4, 5, 8, 18**, Opposer adds “*Subject to and without waiving the foregoing objections, Respondent will produce responsive non-privileged documents*”.

It should be noted that, as of this date, and despite Petitioner’s various email requests to meet and confer (to which Petitioner has received no response), Opposer’s proposition to produce such documents has not been honored.

G: AS TO DOCUMENT REQUEST NO. 53

Respondent states, in its response to **Document request No. 53**, that: “*Opposer further objects to the extent that Requests for Admission #45 in Rusty Lemorande’s First Set of Request for Admission does not exist and therefore no documents are responsive.*”

This is correct, and Petitioner apologizes for the unintentional error.

H: AS TO DOCUMENT REQUEST 76 AND SUBSEQUENT REQUESTS

Opposer states, commencing with **Request 76**, that Petitioner's requests exceed the allowable limits. To the extent this is true, Petitioner apologizes for the error.

I: CONCLUSION

Petitioner has attempted to resolve this matter cordially and professionally, requesting not once but twice that Image 10 meet and confer (Again, see Exhibits A and B). As of this date, there has been no response, either by email, letter, phone call or text. It has therefore become clear that these disputes cannot be resolved between the parties.

Admittedly it is speculative, but it rationally appears, by the combination of Image 10's failure to provide any meaningful responses to this and the other two discovery requests propounded, in addition to its recent stone-cold silence, that there exists a complete absence of good faith by Image 10, constituting an insult to Petitioner and an affront to the discovery process. In addition, Image 10's lack of timely responsiveness (coupled with Image 10's recent silence in the entire matter) arguably suggests a possible malicious attempt to box Petitioner out of his legal right to fair discovery within TTAB's required time frame.

Petitioner is *in pro per*. Perhaps in Image 10's mind this make him unimportant and disqualified to pursue his legal right to properly contest and adjudicate Image 10's Opposition (which Image 10 also has a right to pursue.) Petitioner has treated that Opposition with dignity, diligence and respect, and Petitioner will continue his efforts (both time consuming and with other attendant costs), in the good faith belief that the USPTO does not view *in pro per* parties, and their respective rights, (especially as to a proper and complete discovery process essential in fair adjudication under due process)

as a meaningless fiction and waste of everyone's time.

J: CERTIFICATION OF GOOD FAITH EFFORT TO RESOLVE DISPUTE

In accordance with Trademark Rule 2.120(e), Lemorande hereby certifies that he has made a good faith effort to resolve the issues presented in this motion. *See* Exhibit A and B.

K: SUSPENSION PENDING RESOLUTION

With respect to the effect of a motion to compel discovery, the Trademark Rules of Practice provide:

When a party files a motion for an order to compel initial disclosure, expert testimony disclosure, or discovery, the case will be suspended by the Board with respect to all matters not germane to the motion.

37 C.F.R. § 2.120(e)(2).

Respectfully, this matter should be suspended, and the trial dates should be extended and/or reset pending resolution of this motion.

L: CONCLUSION

For the forgoing reasons, Lemorande respectfully requests that the Board enter an order overruling Image 10's objections discussed above and requiring the production of responsive documents to Lemorande's Request for Production of Documents to Image 10 within 21 days of the Order. In addition, the deadlines should be reset following resolution of this motion.

Dated: December 3, 2017

Respectfully submitted,

Rusty Lemorande
In Pro Per
1245 North Crescent Heights
Blvd.
Los Angeles, CA 90046
Telephone: (786) 600-4655

/Rusty Lemorande/
Rusty Lemorande.
In Pro Per

B. CERTIFICATE OF SERVICE AND FILING

I hereby certify that a copy of the foregoing PETITIONER'S MOTION TO COMPEL DISCOVERY was served on counsel for Image 10 LLC by e- mailing said copy, as agreed by counsel, on December 3, 2017, to the following email address: Michael Meeks. at mmeeks@buchalter.com, Farah Bhatti at fbhatti@buchalter.com, and hblan@buchalter.com

/Rusty Lemorande/

Rusty Lemorande

Serial No: 87090468
Opposition Number: 91233690
Defendant (Lemorande's)
Exhibit

EXHIBIT A



Rusty Lemorande <lemorande@gmail.com>

Meet and Confer

Rusty Lemorande <lemorande@gmail.com>
To: "Bhatti, Farah P." <fbhatti@buchalter.com>

Mon, Nov 27, 2017 at 7:31 PM

Hello:

I'd like to schedule a call so we can confer about your discovery responses. I feel they are, for the most part, non productive, providing little actual discovery.

You've previously made assertions as to common law uses by your client. I want to learn about these uses and properly assess my position going forward. However, with no actual evidence from you, and as the result of other responses by you that I find, frankly, evasive, I am left in the dark. And I believe the USPTO will be, too.

I've also made inquiries, in good faith, as to the reasons for your delays, but have received no actual response as far as I know.

If I am wrong as to any of the above, perhaps you can enlighten me. I am very open to be informed.

May we speak soon to discuss this and see if we can work out a remedy to this matter?

Please let me know if you are willing and when would be a good time for you.

Thank you.

Rusty Lemorande

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Sent from Gmail Mobile Tel [323 309 6146](tel:3233096146)

Serial No: 87090468
Opposition Number: 91233690
Defendant (Lemorande's) Exhibit

EXHIBIT B



Rusty Lemorande <lemorande@gmail.com>

Meet and Confer

Rusty Lemorande <lemorande@gmail.com>

Tue, Nov 28, 2017 at 4:31 PM

To: "Bhatti, Farah P." <fbhatti@buchalter.com>, "Meeks, Michael L." <mmeeks@buchalter.com>

Sending again. Please respond.

RL

On Mon, Nov 27, 2017 at 7:31 PM, Rusty Lemorande <lemorande@gmail.com> wrote:

Hello:

I'd like to schedule a call so we can confer about your discovery responses. I feel they are, for the most part, non productive, providing little actual discovery.

You've previously made assertions as to common law uses by your client. I want to learn about these uses and properly assess my position going forward. However, with no actual evidence from you, and as the result of other responses by you that I find, frankly, evasive, I am left in the dark. And I believe the USPTO will be, too.

I've also made inquiries, in good faith, as to the reasons for your delays, but have received no actual response as far as I know.

If I am wrong as to any of the above, perhaps you can enlighten me. I am very open to be informed.

May we speak soon to discuss this and see if we can work out a remedy to this matter?

Please let me know if you are willing and when would be a good time for you.

Thank you.

Rusty Lemorande

--

Sent from Gmail Mobile Tel [323 309 6146](tel:3233096146)

--

RH Lemorande
P.O. Box 46771
LA, CA 90046
tel: [323 309 6146](tel:3233096146)

EXHIBIT C



Rusty Lemorande <lemorande@gmail.com>

RE: NIGHT OF THE LIVING DEAD - Answers to Interrogatories [IWOV-BN.FID1193774]

Rusty Lemorande <lemorande@gmail.com>

Tue, Nov 7, 2017 at 7:46 PM

To: "Blan, Henry" <hblan@buchalter.com>

Cc: "Bhatti, Farah P." <fbhatti@buchalter.com>, "Levinson, Lisa" <llevinson@buchalter.com>, "Meeks, Michael L." <mmeeks@buchalter.com>, ipdocket <ipdocket@buchalter.com>

Hello

I remain confused. According to the email notice (of the receipt error) you sent me today (below), you attempted to send the answers to interogs today on November 7th. They were due, as you know, no later than Oct 25th.

Am I misinterpreting the notice you sent below? If not, please advise of the date you originally attempted to email me the answers (with a copy of that email), and state why the delay.

Thank you.

RL

----- Forwarded message -----

From: BNFY Administrator <Administrator2@buchalter.com>

To: "Blan, Henry" <hblan@buchalter.com>

Cc:

Bcc:

Date: **Tue, 7 Nov 2017 18:42:02 +0000**

Subject: [Postmaster] Email Delivery Failure

This is a delivery failure notification message indicating that an email you addressed to email address :

-- lemorande@gmail.com

could not be delivered. The problem appears to be :

-- Recipient email server rejected the message

Additional information follows :

-- 5.2.3 Your message exceeded Google's message size limits. Please visit <https://support.google.com/mail/?p=MaxSizeError> to view our size guidelines. i6si1757264qka.221 - smtp

This condition occurred after 1 attempt(s) to deliver over a period of 0 hour(s).

If you sent the email to multiple recipients, you will receive one of these messages for each one which failed delivery, otherwise they have been sent.

On Tue, Nov 7, 2017 at 10:56 AM Blan, Henry <hblan@buchalter.com> wrote:

[Quoted text hidden]

--

[Quoted text hidden]

EXHIBIT D

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Image Ten, Inc. Opposer, v. Rusty Ralph Lemorande Applicant.	Opposition No.: 91233690 OPPOSER IMAGE TEN, INC.'S RESPONSE TO APPLICANT RUSTY LEMORANDE'S FIRST SET OF REQUEST FOR PRODUCTION
--	--

PROPOUNDING PARTY: APPLICANT RUSTY RALPH LEMORANDE ("RUSTY")
RESPONDING PARTY: OPPOSER IMAGE TEN, INC.
SET NO.: ONE (1)

OPPOSER'S RESPONSE TO APPLICANT'S PRODUCTION REQUEST (SET 1)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, and 37 C.F.R. § 2.120 of the Trademark Rules of Practice, Opposer Image Ten, Inc. ("Opposer") hereby submits responses to the First Set of Admissions propounded by Rusty Ralph Lemorande ("Lemorande"), as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTION

1. Opposer states that discovery is ongoing and will continue as long as permitted and that Opposer has not yet completed its investigation in this matter. Opposer specifically reserves its right to introduce any evidence from any source and/or testimony from any witness in this matter.

2. Opposer states that its responses are based on its present knowledge, information or belief. Opposer also states that they are responding to the requests as they interpret and understand each request. Further discovery and investigation may reveal information not presently known to Opposer upon which Opposer may rely at the time of trial. Opposer reserves its right, without assuming any obligation not required by law, to amend or supplement its responses to the requests as necessary.

3. Opposer states that the information and/or documents provided in its responses to the requests do not constitute an admission that such information is relevant to the pending litigation. Opposer specifically reserves all objections to the relevancy or admissibility at trial, or in connection with any motion, hearing or other proceeding, of any information provided.

4. Opposer states that nothing contained in these responses should be construed as an admission relative to the existence or non-existence of any fact and no response is to be considered an admission about the relevance or admissibility of any information contained herein.

5. Opposer expressly incorporates this Preliminary Statement into each of the following responses.

GENERAL OBJECTIONS

A. Opposer objects to the Requests propounded by Applicant to the extent they seek information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence with respect to the issues in this action

B. Applicant objects to the Requests as burdensome and as designed, in whole or in part, to harass rather than to serve any legitimate discovery purpose.

C. Opposer hereby objects to each and every request as being vague and ambiguous.

D. Opposer objects to the Requests as overbroad and not limited to a reasonable time period.

E. Opposer objects to the Requests to the extent they seek information of a commercially sensitive nature. Revealing such information would substantially and irreparably injure Applicant by revealing information which derives independent economic value from not being generally known or which has been acquired primarily through confidential research and development efforts by or on behalf of Applicant.

F. Opposer objects to the Requests to the extent they seek privileged information protected by the attorney-client privilege or the attorney-work product doctrine. Such privileged information includes, but is not limited to, the following:

- a. Information which constitutes, reflects, refers to or relates to confidential communications between officers, directors or employees of Opposer and counsel; and

b. Information which constitutes, reflects, refers to or relates to the impressions, conclusions, opinions or mental process of counsel, their agents or employees.

G. Opposer objects to the Requests to the extent they seek information relating to employees or customers of Opposer, the discovery of which would invade their right to privacy.

H. Opposer objects to the Requests to the extent Applicant has exceeded the limit for such Requests under the Federal Rules of Civil Procedure.

RESPONSES

REQUEST FOR PRODUCTION NO. 1:

Produce copies of all licenses that identify You as a licensor of the Mark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 2:

Produce copies of licenses that identify You as the licensee of the Mark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 3:

Produce copies of all assignment of the Mark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding. Subject to and without waiving the foregoing objections, Opposer will produce responsive non-privileged documents.

REQUEST FOR PRODUCTION NO. 4:

Produce all Documents that evidence your ownership of the Mark in the United States.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding. Subject to and without waiving the foregoing objections, Opposer will produce responsive non-privileged documents.

REQUEST FOR PRODUCTION NO. 5:

Produce copies of complaints and other documents filed by You or on Your behalf regarding any Action You have filed regarding the Mark.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding. Subject to and without waiving the foregoing objections, Opposer will produce responsive non-privileged documents.

REQUEST FOR PRODUCTION NO. 6:

Produce copies of financial statements showing all income earned by you from use of the Mark for Motion Pictures in the last 20 years.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 7:

Produce all other Documents in Your possession, not produced in response to Requests #1-6 above, that in any manner reference, memorialize, acknowledge, mention, discuss or otherwise pertain to Your ownership of the Mark for Motion Picture production.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 8:

Produce all Documents to support the claims You made in the Notice of Opposition.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent

the documents are not relevant to the current proceeding. Subject to and without waiving the foregoing objections, Opposer will produce responsive non-privileged documents.

REQUEST FOR PRODUCTION NO. 9:

Produce all Documents to support your answer to Request for Admission #1 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 10:

Produce all Documents to support your answer to Request for Admission #2 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 11:

Produce all Documents to support your answer to Request for Admission #3 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 12:

Produce all Documents to support your answer to Request for Admission #4 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 13:

Produce all Documents to support your answer to Request for Admission #5 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 14:

Produce all Documents to support your answer to Request for Admission #6 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 15:

Produce all Documents to support your answer to Request for Admission #7 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 16:

Produce all Documents to support your answer to Request for Admission #8 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 17:

Produce all Documents to support your answer to Request for Admission #9 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 18:

Produce all Documents to support your answer to Request for Admission #10 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding. Subject to and without waiving the foregoing objections, Respondent will produce responsive non-privileged documents.

REQUEST FOR PRODUCTION NO. 19:

Produce all Documents to support your answer to Request for Admission #11 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 20:

Produce all Documents to support your answer to Request for Admission #12 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 21:

Produce all Documents to support your answer to Request for Admission #13 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent

documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 22:

Produce all Documents to support your answer to Request for Admission #14 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 23:

Produce all Documents to support your answer to Request for Admission #15 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 24:

Produce all Documents to support your answer to Request for Admission #16 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 25:

Produce all Documents to support your answer to Request for Admission #17 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 26:

Produce all Documents to support your answer to Request for Admission #18 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 27:

Produce all Documents to support your answer to Request for Admission #19 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 28:

Produce all Documents to support your answer to Request for Admission #20 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 29:

Produce all Documents to support your answer to Request for Admission #21 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 30:

Produce all Documents to support your answer to Request for Admission #22 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 31:

Produce all Documents to support your answer to Request for Admission #23 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 32:

Produce all Documents to support your answer to Request for Admission #24 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 33:

Produce all Documents to support your answer to Request for Admission #25 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 34:

Produce all Documents to support your answer to Request for Admission #26 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 35:

Produce all Documents to support your answer to Request for Admission #27 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 36:

Produce all Documents to support your answer to Request for Admission #28 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 37:

Produce all Documents to support your answer to Request for Admission #29 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 38:

Produce all Documents to support your answer to Request for Admission #30 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 39:

Produce all Documents to support your answer to Request for Admission #31 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 40:

Produce all Documents to support your answer to Request for Admission #32 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 41:

Produce all Documents to support your answer to Request for Admission #33 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 42:

Produce all Documents to support your answer to Request for Admission #34 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 43:

Produce all Documents to support your answer to Request for Admission #35 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 44:

Produce all Documents to support your answer to Request for Admission #36 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 45:

Produce all Documents to support your answer to Request for Admission #37 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 46:

Produce all Documents to support your answer to Request for Admission #38 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 47:

Produce all Documents to support your answer to Request for Admission #39 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 48:

Produce all Documents to support your answer to Request for Admission #40 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 49:

Produce all Documents to support your answer to Request for Admission #41 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 50:

Produce all Documents to support your answer to Request for Admission #42 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 51:

Produce all Documents to support your answer to Request for Admission #43 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 52:

Produce all Documents to support your answer to Request for Admission #44 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 53:

Produce all Documents to support your answer to Request for Admission #45 in Rusty Lemorande's First Set of Requests for Admission.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Opposer incorporates the Preliminary Statement and General objections set for the above. Opposer further objects to the extent that Request for Admission #45 in Rusty Lemorande's First Set of Requests for Admission does not exist and therefore no documents are responsive.

REQUEST FOR PRODUCTION NO. 54:

Produce all Documents to support your answer to Interrogatory #1 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 55:

Produce all Documents to support your answer to Interrogatory #2 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 56:

Produce all Documents to support your answer to Interrogatory #3 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 57:

Produce all Documents to support your answer to Interrogatory #4 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 58:

Produce all Documents to support your answer to Interrogatory #5 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 59:

Produce all Documents to support your answer to Interrogatory #6 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 60:

Produce all Documents to support your answer to Interrogatory #7 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 61:

Produce all Documents to support your answer to Interrogatory #8 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 62:

Produce all Documents to support your answer to Interrogatory #9 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 63:

Produce all Documents to support your answer to Interrogatory #10 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 64:

Produce all Documents to support your answer to Interrogatory #11 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 65:

Produce all Documents to support your answer to Interrogatory #12 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 66:

Produce all Documents to support your answer to Interrogatory #13 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 67:

Produce all Documents to support your answer to Interrogatory #14 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 68:

Produce all Documents to support your answer to Interrogatory #15 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 69:

Produce all Documents to support your answer to Interrogatory #16 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 70:

Produce all Documents to support your answer to Interrogatory #17 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 71:

Produce all Documents to support your answer to Interrogatory #18 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 72:

Produce all Documents to support your answer to Interrogatory #19 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 73:

Produce all Documents to support your answer to Interrogatory #20 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 74:

Produce all Documents to support your answer to Interrogatory #21 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the

attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 75:

Produce all Documents to support your answer to Interrogatory #22 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Opposer objects to the extent the request seeks documents protected from discovery by the attorney-client privilege or attorney work product doctrine. Opposer further objects to the extent documents contain confidential and proprietary information. Opposer also objects to the extent the documents are not relevant to the current proceeding.

REQUEST FOR PRODUCTION NO. 76:

Produce all Documents to support your answer to Interrogatory #23 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 77:

Produce all Documents to support your answer to Interrogatory #24 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 78:

Produce all Documents to support your answer to Interrogatory #25 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 79:

Produce all Documents to support your answer to Interrogatory #26 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 80:

Produce all Documents to support your answer to Interrogatory #27 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 81:

Produce all Documents to support your answer to Interrogatory #28 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 82:

Produce all Documents to support your answer to Interrogatory #29 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 83:

Produce all Documents to support your answer to Interrogatory #30 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 84:

Produce all Documents to support your answer to Interrogatory #31 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 85:

Produce all Documents to support your answer to Interrogatory #32 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 86:

Produce all Documents to support your answer to Interrogatory #33 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 87:

Produce all Documents to support your answer to Interrogatory #34 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 88:

Produce all Documents to support your answer to Interrogatory #35 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 89:

Produce all Documents to support your answer to Interrogatory #36 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 90:

Produce all Documents to support your answer to Interrogatory #37 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 91:

Produce all Documents to support your answer to Interrogatory #38 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 92:

Produce all Documents to support your answer to Interrogatory #39 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 93:

Produce all Documents to support your answer to Interrogatory #40 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 94:

Produce all Documents to support your answer to Interrogatory #41 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 95:

Produce all Documents to support your answer to Interrogatory #42 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 96:

Produce all Documents to support your answer to Interrogatory #43 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 97:

Produce all Documents to support your answer to Interrogatory #44 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 98:

Produce all Documents to support your answer to Interrogatory #45 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 99:

Produce all Documents to support your answer to Interrogatory #46 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 100:

Produce all Documents to support your answer to Interrogatory #47 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 101:

Produce all Documents to support your answer to Interrogatory #48 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 102:

Produce all Documents to support your answer to Interrogatory #49 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 103:

Produce all Documents to support your answer to Interrogatory #50 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 104:

Produce all Documents to support your answer to Interrogatory #51 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

REQUEST FOR PRODUCTION NO. 105:

Produce all Documents to support your answer to Interrogatory #52 from Rusty Lemorande's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Opposer incorporates the Preliminary Statement and General Objections set forth above. Moreover, Opposer objects that per Trademark Rule 2.120(e), the number of requests for production of documents is limited to 75. Applicant has exceeded this number.

Dated: November 7, 2017

Respectfully Submitted,

/fbhatti/

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CERTIFICATE OF SERVICE

Opposer, Image Ten, Inc., hereby certifies that a copy of this OPPOSER IMAGE TEN, INC.'S RESPONSE TO APPLICANT RUSTY LEMORANDE'S FIRST SET OF REQUEST FOR PRODUCTION has been served upon Applicant on this 7th day of November, 2017, by First Class U.S. Mail, postage prepaid, at the following address:

Rusty Ralph Lemorande
245 N. Crescent Hts, Blvd. #B
Los Angeles, California 90046

/fbhatti/

Attorney for Opposer